

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C

IN RE:)	MCI's OBJECTIONS TO
Analysis of Continued Availability of)	BELLSOUTH'S FIRST SET
Unbundled Local Switching for Mass Market)	OF INTERROGATORIES AND
Customers Pursuant to the Federal Communication)	FIRST REQUEST FOR
Commission's Triennial Review Order)	PRODUCTION OF DOCUMENTS
)	

MCImetro Transmission Services, LLC,¹ MCI WorldCom Communications, Inc. and MCI WorldCom Network Services, Inc., (collectively "MCI") hereby object to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories and First Requests for Production of Documents to MCI, served on November 19, 2003. Any responses made to BellSouth's interrogatories and requests for production of documents will be made subject to these and subsequent-stated objections, the protective agreement previously executed between the parties, and any protective order as may be issued by the South Carolina Public Service Commission ("Commission") in this docket.

General Objections

MCI makes the following General Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents, including the applicable definitions and general instructions therein ("BellSouth discovery"), which, as appropriate, are specifically identified and incorporated into the relevant responses below.

¹ BellSouth also served these same discovery requests on "MCImetro Access Transmission Services, Inc." That is the former name of MCImetro Access Transmission Services, LLC.

1. MCI has interpreted the BellSouth discovery to apply to MCI's regulated intrastate operations in South Carolina and will limit its responses accordingly. To the extent that any BellSouth discovery is intended to apply to matters that take place outside the state of South Carolina and which are not related to South Carolina intrastate operations subject to the jurisdiction of the Commission, MCI objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.
2. MCI objects to the BellSouth discovery to the extent that such discovery calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
3. MCI objects to the BellSouth discovery insofar as such discovery is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests.
4. MCI objects to the BellSouth discovery insofar as such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.
5. MCI objects to the BellSouth discovery insofar as it seeks information or documents, or seek to impose obligations on MCI which exceed the requirements of the South Carolina Rules of Civil Procedure, South Carolina law, the Commission's Public Utilities Rules of Practice and Procedure and other Commission rules, or any other applicable laws, rules, or procedures.
6. MCI objects to providing information to the extent that such information is already in the public record before the Commission or which is already in the possession, custody, or control of BellSouth.

7. MCI objects to the BellSouth discovery to the extent that such discovery is overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written.
8. MCI objects to each and every request to the extent that the information requested constitutes trade secrets or confidential commercial or financial information of a proprietary nature which are privileged pursuant to Rules 4D and 4I of the Commission's Public Utilities Rules of Practice and Procedure, as well as Sections 25-61-9, 25-61-11, and 79-23-1 of the South Carolina Code. To the extent that BellSouth's requests seek proprietary confidential business information which is not the subject of any such privilege, MCI will make such information available to counsel for BellSouth pursuant to the Protective Agreement previously executed between the parties and any subsequent protective order, as may be issued in this docket, subject to any other general or specific objections contained herein.
9. MCI is a large corporation with employees located in many different locations in South Carolina and in other states. In the course of its business, MCI creates countless documents that are not subject to the Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. MCI will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that BellSouth discovery purports to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

10. MCI objects to the BellSouth discovery that seeks to obtain “all,” “each,” or “every” document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome.
11. MCI objects to the BellSouth discovery to the extent such discovery seeks to have MCI create documents not in existence at the time of the request.
12. MCI objects to the BellSouth discovery to the extent that such discovery is not limited to any stated period of time or a stated period of time that is longer than is relevant for purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.
13. In light of the short period of time MCI has been afforded to respond to the BellSouth discovery, the development of MCI’s positions and potentially responsive information to the BellSouth requests is necessarily ongoing and continuing. This process is further complicated since, at this point in time, the actual issues to be set forth for hearing in this docket have not yet been established by order of the Commission. Except where otherwise stated in response to a specific BellSouth discovery request, MCI does not assume an affirmative obligation to supplement its answers on an ongoing basis, contrary to the BellSouth General Instructions.
14. MCI objects to the definition of “voice-grade equivalent lines,” and each and every interrogatory or request for production that includes such term, as this term is not used by MCI in the course of its business, and MCI does not maintain information regarding “voice-grade equivalent lines” in the ordinary course of business. Given MCI’s business records, MCI will answer such discovery by providing information regarding MCI’s DSOs.

15. MCI objects to each and every interrogatory or request for production that seeks information regarding enterprise customers as such discovery is irrelevant for purposes of this docket and is not reasonably calculated to lead to the discovery of admissible evidence since the scope of this proceeding, as set forth by the FCC and the Commission, is limited to local circuit switching for mass market customers.
16. MCI objects to each and every interrogatory or request for production that seeks information regarding non-switched services (e.g., services that do not depend on Class 5 switches) except for non-switched services (e.g., DSL) provided on loops that are also used to provide switched services, as such discovery is irrelevant for purposes of this docket and is not reasonably calculated to lead to the discovery of admissible evidence since the scope of this proceeding, as set forth by the FCC and the Commission, is limited to local circuit switching for mass market customers.
17. MCI objects to each and every interrogatory or request for production that seeks information regarding MCI's operations in ILEC service areas other than the BellSouth ILEC service area within the state of South Carolina as such information is irrelevant to BellSouth's case in this docket and such discovery is overly broad and unduly burdensome.
18. MCI objects to each and every interrogatory or request for production that seeks to obtain information regarding "former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of MCI" as such information is not within MCI's control, would be unduly burdensome to attempt to obtain and is likely irrelevant.
19. MCI objects to the definitions for "qualifying service" and "non-qualifying service," and each and every interrogatory or request for production that includes such terms, as MCI

does not use such terms in the ordinary course of business, does not maintain information regarding “qualifying service” and “non-qualifying service” in the ordinary course of business, and answering in these terms would require MCI to provide a legal interpretation of the FCC’s terms. With the exception of the specific services the FCC has designated as qualifying or non-qualifying, the term is not clearly defined by the FCC or by BellSouth. For example, as the FCC stated in footnote 466 of the Triennial Review Order (FCC 03-36, released August 21, 2003) (“TRO”), “Our list is intended to identify general categories of services that would qualify as eligible services. It is not intended to be an exhaustive list or to identify services in a more particular manner.” Thus, such discovery is overly broad and vague and it would be unduly burdensome for MCI to respond to such ambiguous discovery.

20. MCI objects to the definitions for “hot cut,” “batch hot cut,” and “individual hot cut,” and each and every interrogatory or request for production that includes such terms, as such definitions are vague in that it is not clear whether or to what extent BellSouth’s practices are consistent with the FCC’s use of such terms, however, such terms may be defined by the FCC. Thus, such discovery is overly broad and vague and it would be unduly burdensome for MCI to respond to such ambiguous discovery. MCI further objects to BellSouth’s use of such terms as they apply to BellSouth’s individual hot cut process as MCI is not privy to each and every process or procedure employed by BellSouth in implementing such hot cuts.
21. MCI objects to each and every interrogatory or request for production that seeks information regarding MCI’s projections regarding future services, revenues, marketing, strategies, equipment deployments, or other such future business plans as such requests

are trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues to be decided in this docket. Moreover, MCI's future plans are irrelevant because the TRO concerns a hypothetical CLEC.

22. MCI objects to BellSouth's discovery to the extent it seeks information not within MCI's possession, control, or custody or to the extent BellSouth's discovery requests that MCI provide information that MCI does not maintain in the ordinary course of business.

INTERROGATORIES

INTERROGATORY 1. Identify each switch owned by MCI that MCI uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, and 18 as if set forth herein verbatim.

INTERROGATORY 2. For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

MCI RESPONSE: With respect to Interrogatory 2 (a)-(c), MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim. With

respect to Interrogatory 2 (d)-(f), MCI adopts and incorporates its General Objections 8, 14, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 3. Identify any other switch not previously identified in Interrogatory No. 1 that MCI uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by MCI either on an unbundled or resale basis.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, and 19 as if set forth herein verbatim.

INTERROGATORY 4. For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) identify all documents referring or relating to the rates, terms, and conditions of MCI’s use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

MCI RESPONSE: MCI adopts and incorporates its General Objection 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 14, 15, 17, 19 and 22 as if set forth herein verbatim.

INTERROGATORY 8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches

identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of MCI’s provision of switching capability.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim. With respect to MCI’s relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this

proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim. With respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, and 21 as if set forth herein verbatim. With respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in South Carolina? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in South Carolina.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 8, 10, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 19. Identify each MSA in South Carolina where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 8, 9, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 22. Identify each MSA in South Carolina where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 3, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 3, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 25. Please state the total number of end users customers in the State of South Carolina to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 26. For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, and 19 as if set forth herein verbatim.

INTERROGATORY 27. For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 28. Please state the total number of end users customers in the State of South Carolina to whom you only provide non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 29. For those end user customers to whom you only provide non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 30. Please state the total number of end users customers in the State of South Carolina to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 33. Please provide a breakdown of the total number of end user customers served by MCI in South Carolina by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, and 17, and 22 as if set forth herein verbatim.

INTERROGATORY 36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, 21 and 22 as if set forth herein verbatim.

INTERROGATORY 37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in South Carolina.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in South Carolina.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 39. Describe how the marketing organization that is responsible for marketing qualifying service in South Carolina is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in South Carolina, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 7, 8, 9, 10, 15, and 22 as if set forth herein verbatim.

INTERROGATORY 40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, and 17 as if set forth herein verbatim.

INTERROGATORY 41. Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DSOs? For instance, if a customer had 10 DSOs, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DSOs? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DSOs.)

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, and 17 as if set forth herein verbatim.

INTERROGATORY 43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

MCI RESPONSE: MCI adopts and incorporates its General Objections 9, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 46. Provide your definition of sales expense as that term is used in your business.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for MCI in each state in BellSouth's region.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 12, and 20 as if set forth herein verbatim.

INTERROGATORY 51. For each individual hot cut identified in response to Interrogatory No. 50, state:

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, MCI, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether MCI complained in writing to BellSouth or anyone else.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 7, 8, 10, 12, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 52. Does MCI have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 53. Does MCI have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 54. If MCI has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 55. If MCI has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 56. Does MCI have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please

provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 57. Does MCI have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 58. What is the largest number of individual hot cuts that MCI has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 59. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 60. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 61. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 62. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 63. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 64. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 65. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 66. Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 67. Does MCI order coordinated or non-coordinated hot cuts?

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, and 17 and 22 as if set forth herein verbatim.

INTERROGATORY 68. Does MCI use the CFA database?

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, and 22 as if set forth herein verbatim.

INTERROGATORY 69. Identify every issue related to BellSouth's hot cut process raised by MCI at the South Carolina CLEC collaborative since October 2001.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 20 and 22 as if set forth herein verbatim.

INTERROGATORY 70. What is the appropriate volume of loops that you contend the Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 71. What is the appropriate process that you contend the Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 72. If MCI disagrees with BellSouth's individual hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 73. If MCI disagrees with BellSouth's bulk hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 74. Identify by date, author and recipient every written complaint MCI has made to BellSouth regarding BellSouth's hot cut process since October 2001.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 75. How many unbundled loops does MCI contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 76. What is the appropriate information that you contend the Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 77. What is the average completion interval metric for provision of high volumes of loops that you contend the Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 78. What are the rates that you contend the Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 79. What are the appropriate product market(s) that you contend the Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 80. What are the appropriate geographic market(s) that you contend the Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 81. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 82. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 83. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the Commission should consider in establishing a “cutoff” consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 84. Identify each market in the U.S. where you provide local telephone service, the year and month when you first offered local exchange service, the type of customers (residence or business) you serve, and the number of lines served in each market.

MCI RESPONSE: MCI incorporates its General Objections 1, 2, 3, 4, 7, 22, 10, and 17 as if set forth herein verbatim. MCI further objects to this question on the ground that it improperly calls for a legal conclusion regarding one of the issues in this proceeding,

and therefore is an inappropriate subject for an interrogatory.

INTERROGATORY 85. For those end user customers to whom you provide qualifying and non-qualifying service in the state of South Carolina, state the average monthly revenues (and identify the revenue separately for qualifying and non qualifying services, local and long distance services, and any other services) you receive from each such end user customer for those customers:

- a. End users with 1 line;
- b. End users with 2 lines;
- c. End users with 3 lines;
- d. End users with 4 lines;
- e. End users with 5 lines;
- f. End users with 6 lines;
- g. End users with 7 lines;
- h. End users with 8 lines;
- i. End users with 9 lines;
- j. End users with 10 lines;
- k. End users with 11 lines;
- l. End users with 12 lines;
- m. End users with 13 lines;
- n. End users with 14 lines;
- o. End users with 15 lines;
- p. End users with 16 lines;
- q. End users with 17 lines;
- r. End users with 18 lines;
- s. End users with 19 lines;
- t. End users with 20 lines;
- u. End users with 21 lines;
- v. End users with 22 lines;
- w. End users with 23 lines;
- x. End users with 24 lines;
- y. End users with more than 24 lines.

MCI RESPONSE: MCI incorporates its General Objections 3, 7, 22, 11, 17, and 19, as if set forth herein verbatim.

INTERROGATORY 86. For each class or type of end user customer you identified in response to BellSouth's Interrogatory No. 33, state the general and administrative (G&A) expenses in South Carolina.

MCI RESPONSE: MCI incorporates its General Objections 3, 7, 22, 10, 8, 17, 22 and 15, as if set forth herein verbatim.

INTERROGATORY 87. Provide your revenues, separately identified by qualifying and non-qualifying services, in South Carolina for the period 1996 through present.

MCI RESPONSE: MCI incorporates its General Objections 3, 7, 22, 17, and 19, as if set forth herein verbatim.

INTERROGATORY 88. Provide a statement of income (1996 through present) or profitability for each market in South Carolina or for the most granular level that you have in South Carolina.

MCI RESPONSE: MCI incorporates its General Objections 2, 3, 22, and 17, as if set forth herein verbatim. MCI further objects to this question on the ground that it improperly calls for a legal conclusion regarding one of the issues in this proceeding, and therefore is an inappropriate subject for an interrogatory.

INTERROGATORY 89. For each 100 of the types of end user customers identified in your response to BellSouth's Interrogatory No. 84 above, state how many are added as a result of:

- a. Telemarketing;
- b. Direct mail;
- c. Customer-initiated call for service;
- d. Customer-initiated Internet request for service;
- e. Direct contact (other than telemarketing) from service rep;
- f. Other Sales Channel (please describe).

MCI RESPONSE: MCI incorporates its General Objections 3, 4, 7, 22, 11, 17, and 19, as if set forth herein verbatim.

INTERROGATORY 90. For the customers identified in response to BellSouth's Interrogatory No. 85 above, identify with particularity the average customer acquisition cost by sales channel.

MCI RESPONSE: MCI incorporates its General Objections 3, 4, 7, 22, 17, and 19, as if set forth herein verbatim.

INTERROGATORY 91. Describe with particularity whether and how you use (a) newspaper (b) television (c) radio media to (d) direct mail marketing and telemarketing to attract residential or other business subscribers. Identify all documentation you relied upon to support your response.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 4, 12, 10, and 21, as if set forth herein verbatim.

INTERROGATORY 92. For each of the sales channels identified in your response to BellSouth's Interrogatory Request No. 89 above and as related to each customer line size as described in Interrogatory Request 85 above, provide a take rate per product offering as measured as a percentage of the number of potential customers actually contacted.

MCI RESPONSE: MCI incorporates its General Objections 3, 4, 7, 22, 17, and 19, as if set forth herein verbatim.

INTERROGATORY 93. Identify the percentage of your customers by line size as described in your response to BellSouth's Interrogatory No. 85 above, that accept your service under a bundle or package that includes any combination of local service, long distance, DSL or other data product or voicemail. Identify all documentation you relied upon to support your response.

MCI RESPONSE: MCI incorporates its General Objections 3, 4, 7, 22, 11, 17, 19 and 16, as if set forth herein verbatim.

INTERROGATORY 94. Describe the criteria you consider to enter a specific market offering qualified services. In your response please detail how, and the extent to which, you rely on both business customers and residential customers to meet the financial criteria. Also identify the criteria used to select the customers that are marketed to or contacted in your marketing campaigns.

MCI RESPONSE: MCI incorporates its General Objections 1, 2, 3, 4, 10, 19, and 21, as if set forth herein verbatim. MCI further objects to this question on the ground that it improperly calls for a legal conclusion regarding one of the issues in this proceeding, and therefore is an inappropriate subject for an interrogatory.

INTERROGATORY 95. What percentage of the total lines in each market in South Carolina satisfy the criteria described in your response to 94?

MCI RESPONSE: MCI incorporates its General Objections 1, 2, 3, 4, 22, 10, 19, and 21, as if set forth herein verbatim. MCI further objects to this question on the ground that it improperly calls for a legal conclusion regarding one of the issues in this proceeding, and therefore is an inappropriate subject for an interrogatory.

INTERROGATORY 96. For each of the customer line counts described in your response to BellSouth's Interrogatories Request No. 85 above, please provide the quantity and percentage of customers that accept your service for:

- a. local, long distance and Voicemail;
- b. local and long distance;
- c. Local, long distance, and DSL or other data product.

MCI RESPONSE: MCI incorporates its General Objections 3, 7, 22, 17, 19 and 16, as if set forth herein verbatim.

INTERROGATORY 97. Please provide, on a customer segment basis (residence, small business, large business), or the next most granular level available, the quantity and

percentage of your customers that accept service, without purchasing a package (a la carte).

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 22, and 15, as if set forth herein verbatim.

INTERROGATORY 98. Please identify all documents and underlying data that you use to compute churn rates.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, and 10, as if set forth herein verbatim.

INTERROGATORY 99. Please provide your bad debt expense as a percentage of revenue over the period 1996 to present.

MCI RESPONSE: MCI incorporates its General Objections 1, 22, and 12, as if set forth herein verbatim.

INTERROGATORY 100. With regard to long distance services, please provide the following:

- a. your average revenue per minute (ARPU) for long distance service in the state;
- b. average revenue per minute (ARPU) for long distance service in the state for residential customers;
- c. average revenue per minute (ARPU) for long distance service in the state for business customers in total;
- d. average revenue per minute (ARPU) for long distance service in the state for business customers with 1-3 lines
- e. average revenue per minute (ARPU) for long distance service in the state for business customers with 4-8 lines.
- f. average revenue per minute (ARPU) for long distance service in the state for business customers with 9-23 lines.
- g. average revenue per minute (ARPU) for long distance service in the state and for business customers with 24 or more lines.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, 11, 17 and 15, as if set forth herein verbatim.

INTERROGATORY 101. With regard to bundles of local and long distance services offered to retail customers:

- a. Provide the proportion or percentage (nationally) of residential customers that receive a bundled offering of local and long distance service.
- b. Provide the proportion (for the state) of residential customers that receive a bundled offering of local and long distance service.

- c. Provide the average monthly revenue per customer for those customers with 1 line and with 2 lines.
- d. Provide the proportion (nationally) of your business customers that receive a bundled offering of local and long distance service.
- e. Provide the proportion (for the state) of your business customers that receive a bundled offering of local and long distance service.
- f. Provide the average monthly revenue per customer for those customers with 4 lines and with 5 lines.
- g. Provide the proportion (nationally) of business customers with 1-3 lines that receive a bundled offering of local and long distance service.
- h. Provide the proportion (in the state) of business customers with 1-3 lines that receive a bundled offering of local and long distance service.
- i. Provide the average monthly revenue per customer for those customers identified with 7 lines and with 8 lines.
- j. Provide the proportion (nationally) of business customers with 4-8 lines that receive a bundled offering of local and long distance service.
- k. Provide the proportion (in the state) of business customers with 4-8 lines that receive a bundled offering of local and long distance service.
- l. Provide the average monthly revenue per customer for those customers with 10 lines and with 11 lines.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, 11, 17 and 15, as if set forth herein verbatim.

INTERROGATORY 102. With respect to your retail bundled offerings that include DSL or Data Services:

- a. Provide the proportion (nationally and for the state) of residential customers that receive a bundled offering that includes DSL.
- b. Provide the average price discount for such bundles from the retail rates in a.
- c. Provide the proportion (nationally, and for the state) of business customers that receive a bundled offering including DSL or data services.
- d. Provide the average price discount for such bundles from the retail rates in c.
- e. Provide the proportion (nationally, and for the state) of business customers in the 1-3 line size that receive a bundled offering including DSL or data services.
- f. Provide the average price discount for such bundles from the retail rates in e.
- g. Provide the proportion (nationally, and for the state) of business customers in the 4-8 line size that receive a bundled offering including DSL or data services.
- h. Provide the average price discount for such bundles from the retail rates in g.
- i. Provide the proportion (nationally, and for the state) of business customers in the 9-23 line size that receive a bundled offering including DSL or data services.
- j. Provide the average price discount for such bundles from the retail rates in i.
- k. Provide the proportion (nationally, and for the state) of business customers

with 24 or more lines that receive a bundled offering including data services.

1. Provide the average price discount for such bundles from the retail rates in k.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, 11, 17, 15 and 16, as if set forth herein verbatim.

INTERROGATORY 103. With respect to any discounts you offer on long distance services:

- a. Provide the approximate proportion of your long distance business customers that receive service via a contract with a volume and/or term discount.
Provide the response by:
 - i. Business with 1-3 lines
 - ii. Businesses with 4-8 lines
 - iii. Businesses with 9-23 lines
 - iv. Businesses with 24 or more lines
- b. For the answer in a above, approximately what is the discount in percentage terms for each line size?
- c. For the answer in a above, approximately what is the range of terms for each line size?
- d. Provide the approximate proportion of your long distance residential customers that receive service via a contract with a volume and/or term discount.
- e. For the answer in c above, approximately what is the discount in percentage terms?
- f. What is the lowest price per minute that the company sells to a customer for long distance service?
- g. For the question e above, what terms and conditions are required in order to obtain this rate?

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, 11, 17 and 15, as if set forth herein verbatim.

INTERROGATORY 104. With respect to any long distance services you provide:

- a. What proportion of your total long distance service that is provided to customers nationally is provided through your own switches?
- b. What proportion of your total long distance service that is provided to customers nationally is not provided through your own switches?
- c. What proportion of your total long distance service that is provided to customers in the state of South Carolina is provided through your own switches?
- d. What proportion of your total long distance service that is provided to customers in the state of South Carolina is not provided through your own switches?
- e. What proportion of your total long distance service that is provided to

customers nationally is provided via resale of another company's long distance service? Provide annual number of long distance minutes that are resold nationally.

- f. What proportion of your total long distance service that is provided to customers nationally is not provided via resale of another company's long distance service? Provide annual number of long distance minutes that are not resold nationally.
- g. For resold long distance service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for long distance service provided to customers nationally?
- h. For g above, does this include nonrecurring charges?
- i. For resold long distance service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for long distance service provided to customers in the state of South Carolina?
- j. For answer g, under what terms and conditions do you purchase the resold service?
- k. For answer i, under what terms and conditions do you purchase the resold service?

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 4, 7, 22, and 17, as if set forth herein verbatim.

INTERROGATORY 105. Identify the retail rates you charge for special access or similar transport services offered to customers. Your response should include all relevant non-recurring and recurring rates you charge your customers.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, 10, and 17, as if set forth herein verbatim.

INTERROGATORY 106. With respect to transport material prices you pay for equipment:

- a. What is the average vendor discount (in percentage) from vendor retail prices you receive for 1/0 multiplexer equipment?
- b. Provide the material prices, year of acquisition, capacity expressed in DS0 equivalents and the engineered utilization for the most recent acquisitions of 1/0 multiplexer equipment.
- c. What is the average vendor discount (in percentage) from vendor retail prices the company receives for 3/1 multiplexer equipment?
- d. Provide the material prices, year of acquisition, capacity expressed in DS0 equivalents and the engineered utilization for the most recent acquisitions of 3/1 multiplexer equipment.
- e. What is the average vendor discount (in percentage) from vendor retail prices the company receives for optical fiber?
- f. Provide the material prices, year of acquisition, fiber capacity and the engineered utilization for the most recent acquisitions of optical fiber?

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, and 17, as if set forth herein verbatim.

INTERROGATORY 107. With respect to the cost you pay for leased transport capacity:

- a. Provide the monthly price(s) paid for most recent lease of DS1 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- b. Provide the non-recurring price(s) paid for most recent lease of DS1 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- c. Provide the monthly price(s) paid for most recent lease of DS3 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- d. Provide the non-recurring price(s) paid for most recent lease of DS3 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- e. Provide the monthly price(s) paid for most recent lease of OC3 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- f. Provide the non-recurring price(s) paid for most recent lease of OC3 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- g. Provide the monthly price(s) paid for most recent lease of OC12 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- h. Provide the non-recurring price(s) paid for most recent lease of OC12 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- i. Provide the monthly price(s) paid for most recent lease of OC48 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- j. Provide the non-recurring price(s) paid for most recent lease of OC48 capacity from a company other than BellSouth. Include all non-recurring rate elements.
- k. Provide the monthly price(s) paid for most recent lease of OC192 capacity from a company other than BellSouth. Include all monthly rate elements such as per termination and/or per mile rates.
- l. Provide the non-recurring price(s) paid for most recent lease of OC192 capacity from a company other than BellSouth. Include all non-recurring rate elements.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, and 17, as if set forth herein verbatim.

INTERROGATORY 108. With respect to the prices you pay for voice mail equipment:

- a. What is the average vendor discount (in percentage) from vendor retail prices

- you receive for voice mail equipment?
- b. Provide the material prices, year of acquisition, capacity expressed in number of voice mailboxes and the engineered utilization for the most recent acquisitions of voice mail equipment.

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, and 17, as if set forth herein verbatim.

INTERROGATORY 109. With respect to the prices you pay for Operator Assistance Costs:

- a. What proportion of your total operator services provided to customers nationally is provided via resale of another company's operator service? Provide annual number of operator minutes that are resold nationally.
- b. What proportion of your total operator services that is provided to customers nationally is not provided via resale of another company's operator service? Provide annual number of operator minutes that are not resold nationally.
- c. For resold operator service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for operator services provided to customers nationally?
- d. For resold operator service, what is the average cost per minute (i.e., the average amount paid to the reselling company per minute) for operator service provided to customers in the state of South Carolina?
- e. For answer c above under what terms and conditions do you purchase the resold service?
- f. For answer d above, under what terms and conditions do you purchase the resold service?

MCI RESPONSE: MCI incorporates its General Objections 1, 3, 7, 22, and 17, as if set forth herein verbatim.

INTERROGATORY 110. In the FCC's Triennial Review Order, TRO, released August 21, 2003, it discusses determination of economic entry on the basis of the "most efficient business model" and "most efficient network architecture" (§517):

- a. Do you employ "the most efficient business model" as that phrase is used in 517 of the TRO? Explain with particularity your answer.
- b. Do you employ "the most efficient network architecture" as that phrase is used at paragraph 517 of the TRO? Explain with particularity your answer.
- c. Are you the least cost competitive (CLP) provider in the state?
- d. If the answer to c is anything other than an unqualified no, please identify which provider you believe is the least cost provider.
- e. If the answer to c is anything other than an unqualified no, please estimate the percentage by which you believe your costs exceed (on an average basis) the costs of the least cost competitive provider.

MCI RESPONSE: MCI incorporates its General Objections 1, 2, 3, 22, and 17, as if set forth herein verbatim. MCI further objects to this question on the ground that it improperly calls for a legal conclusion regarding one of the issues in this proceeding, and therefore is an inappropriate subject for an interrogatory.

INTERROGATORY 111. If you offer long distance services to your customers, state for each state in the BellSouth region the average access charges you pay for (a) originating and (b) terminating long distance services. An average based on the most recently available month or quarter will be sufficient.

MCI RESPONSE: MCI incorporates its General Objections 1, 6, 22, and 17, as if set forth herein verbatim.

REQUESTS FOR PRODUCTION

PRODUCTION REQUEST No. 1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

MCI RESPONSE: MCI adopts and incorporates its objections contained in any interrogatory to which it may identify and produce responsive documents.

PRODUCTION REQUEST No. 2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of South Carolina.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you only provide non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in South Carolina to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 8. Provide all documents referring or relating to the classifications used by MCI to offer service to end user customers South Carolina (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 34.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 35.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 11. Produce all documents referring or relating to how MCI determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 12. Produce all documents referring or relating to the typical or average number of DS0s at which MCI would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 13. Produce all documents referring or relating to the cost of capital used by MCI in evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 14. Produce all documents referring or relating to the time period used by MCI in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 17. Produce all documents referring or relating to any complaints by MCI or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 7, 8, 10, 12, 20, and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

Respectfully submitted,

November _____, 2003.

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CERTIFICATE OF SERVICE

PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 25th day of November, 2003, she served by mail the MCI's Objections to BellSouth's First Set of Interrogatories and First Requests for Production of Documents in the above entitled case upon all counsel of record by causing same to be deposited in an authorized United States Mail Box; that the envelopes containing said document were properly addressed, securely wrapped and sealed and bore the proper postage; and that said envelopes were addressed to the persons indicated below, and via electronic mail by sending copies of same via electronic mail to the email addresses indicated below.

F. David Butler, Esquire
The Public Service Commission
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Deleted: ¶

Betty J. DeHart

SWORN to before me this

____ day of November, 2003.

(L.S.)

Notary Public for South Carolina

My Commission Expires: _____

Deleted: William F. Austin, Esquire¶
 . Austin, Lewis & Rogers¶
 . Post Office Box 11716¶
 . Columbia, S.C. 29211¶
 ¶
 . Francis P. Mood, Esquire¶
 . Haynsworth, Sinkler & Boyd, P.A.¶
 . Post Office Box 11889¶
 . Columbia, S.C. 29211¶
 ¶
 . Scott Elliott, Esquire¶
 . Elliott & Elliott, P.A.¶
 . 721 Olive Street¶
 . Columbia, S.C. 29205¶
 ¶
 . Frank Ellerbe, III, Esquire¶
 . Robinson, McFadden & Moore, P.C.¶
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